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Attorneys for Plaintiff

Penn-Star Insurance Company

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

PENN-STAR INSURANCE  
COMPANY,

Plaintiff,

vs.

YI-SUN CHIU; CHRISTY ZHENG  
LEI; MR. CHIU CONSTRUCTION  
LLC,

Defendants.

CIVIL NO. 22-cv-00375 JMS-WRP  
(DECLARATORY JUDGMENT)

STIPULATION FOR DISMISSAL  
WITH PREJUDICE

JUDGE: Hon. J. Michael Seabright

**STIPULATION FOR DISMISSAL WITH PREJUDICE**

IT IS HEREBY STIPULATED by and between the parties hereto, through their respective counsel, that Plaintiff Penn-Star Insurance Company (“Penn-Star”)’s Complaint for Declaratory Judgment, filed on August 15, 2022 in the instant matter, is hereby dismissed with prejudice against Defendants Yi-Sun Chiu, Christy Zheng Lei, and Mr. Chiu Construction LLC’s (collectively “Defendants”). This Stipulation is made pursuant to Rules 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure and Rule 41.1 of the Local Rules of Practice for the United States District Court for the District of Hawaii.

All claims against Defendants are dismissed with prejudice. There are no remaining claims in the above-captioned lawsuit. All parties shall bear their own attorneys’ fees and costs.

This Stipulation has been signed by counsel for all parties who have made an appearance in this action.

DATED: Honolulu, Hawaii, May 30, 2025.

/s/ Wayne R. Wagner

EDMUND K. SAFFERY  
WAYNE R. WAGNER

Attorneys for Plaintiff  
PENN-STAR INSURANCE  
COMPANY

DATED: Honolulu, Hawaii, May 30, 2025.

/s/ Wen Sheng Gao

WEN SHENG GAO

Attorney for Defendants  
YI-SUN CHIU, CHRISTY ZHENG  
LEI, and MR. CHIU CONSTRUCTION  
LLC

APPROVED AS TO FORM:



/s/ J. Michael Seabright

J. Michael Seabright  
United States District Judge

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**Stipulation for Dismissal With Prejudice**

*Penn-Star Insurance Co. v. Yi-Sun Chiu et al.*, 22-cv-00375 JMS-WRP  
United States District Court for the District of Hawaii